

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

YEHUDA HERSKOVIC,

Plaintiff,

-against-

VERIZON WIRELESS,

Defendant.

Case No.: 1:2019cv03372

DECLARATION OF DANIEL REED IN SUPPORT OF DEFENDANT CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS' MOTION TO COMPEL CONTRACTUAL ARBITRATION AND STAY ACTION

Case Removed: June 6, 2019

DECLARATION OF DANIEL REED IN SUPPORT OF MOTION TO COMPEL CONTRACTUAL ARBITRATION AND STAY ACTION

I, Daniel Reed, hereby declare as follows:

1. I am over the age of 18 and am competent to testify to the facts declared below, and could testify truthfully thereto if required. I am currently employed by Verizon Wireless as a Senior Analyst. I have been employed by Verizon Wireless since 2005.

2. The Verizon Consumer Group where I am employed provides services to Celco Partnership d/b/a Verizon Wireless ("Verizon Wireless"). In my capacity as a Senior Analyst, I assist with the handling of consumer disputes for Verizon Wireless, among other things.

3. In preparing this Declaration, I have relied on my personal knowledge of, and experience in, the business operations of Verizon Wireless as well as a review of Verizon Wireless' business records. Verizon Wireless' business records are made in the regular course of business, at or near the time of the act, conditions or events described in the documents, and by or from information provided by a person with knowledge of the act, conditions or events. True and correct copies of the business records of Verizon Wireless relevant to this Declaration are attached hereto as Exhibits A, B, and C.

4. Verizon Wireless is a citizen of Delaware and New Jersey.

5. On April 2, 2014, at a Verizon Wireless retail location in Brooklyn, NY, Plaintiff Yehuda Herskovic (“Plaintiff”) activated wireless service with Verizon Wireless. Before Verizon Wireless activated Plaintiff’s service, Plaintiff executed a customer agreement (“Customer Receipt”). Attached hereto as **Exhibit A** is a true and correct copy of the receipt executed by Plaintiff on April 2, 2014.

6. Attached hereto as **Exhibit B** is a true and correct copy of the Verizon Wireless Customer Agreement in effect when Plaintiff activated his cellular service with Verizon Wireless on or about April 2, 2014.

7. Attached hereto as **Exhibit C** is a true and correct copy of a notice of activation for the cellular telephone ending in 0599, dated April 5, 2014, which Verizon Wireless sent to Plaintiff along with a copy of the Customer Agreement.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on July 24, 2019 at Irvine, California.



DANIEL REED